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February 19, 1990

FOR SETTLEMENT
PURPOSES ONLY

Scott Pemberton, Esq.
Assistant Regional Counsel
United States EPA, Region VII
726 Minnesota
Kansas City, Kansas 66101



40026990
SUPERFUND RECORDS

Re: Martha C. Rose Chemical Company Superfund Site,
Holden, Missouri

Dear Mr. Pemberton:

I represent Broome County, New York Department of Public Works and Van Buren Light & Power District with regard to the above-referenced Rose Chemical Superfund site. This letter is also written on behalf of a group of other entities accused by the Rose Chemical Steering Committee of being potentially responsible parties as generators of the PCB materials which are claimed to have caused the contamination of the Martha C. Rose Chemical Company site in Holden, Missouri. The other entities and their local counsel are listed below.

As we discussed on the phone on January 9 and February 16, 1990, we are interested in negotiating a de minimus party settlement with the U.S. EPA in exchange for our clients' payment of a fair share of response costs for the Rose Chemical site. To date, the settlement offers made by the Rose Chemical Steering Committee (plaintiffs in the private cost recovery action) do not represent an equitable distribution of the anticipated response costs. If the amount demanded by plaintiffs were paid, the plaintiffs who have contributed 57% of the hazardous materials to the site and would pay only approximately 30% to 35% of the estimated total response costs.

Each of our clients, individually, is claimed to be responsible for only a fraction of one percent of the PCB waste at the Rose Chemical site. Collectively our clients are claimed to be responsible for approximately one percent of all the waste sent to the Rose Chemical site between 1983 and the time it

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closed. In exchange for the premium payment proposed below, our clients are interested in a full release, including contribution protection.

Using plaintiffs' April 6, 1988 waste-in list figures, which none of these PRP's admit to be true, our clients will make an appropriate payment of some of the EPA's past response costs. On the phone, you estimated these costs to be in the \$1-\$1.2 million dollar range. The plaintiffs have agreed that the waste of Kaw Valley Electric was double counted so Kaw Valley is responsible for only 18,636 pounds of waste. Copies of the Steering Committee's April 6, 1988 waste-in list and their adjustment of Kaw Valley Electric's waste contribution are enclosed. Also enclosed is a comparative waste-in list summarizing the waste contributions of the plaintiff Steering Committee members and the generator entities listed below.

Based on plaintiffs' figures, my clients and the other generators listed below are claimed to be responsible for only 329,728 pounds of PCB waste at the Rose Chemical site. Based on these assumed figures, as a group these generators will pay for that waste at a rate of \$1.75 per pound resulting in a total payment from the generators of \$577,024. This represents a payment equal to two percent of plaintiffs' reasonably recoverable response costs which we estimate to be no more than \$30 million dollars. A straight lineal distribution of plaintiffs' reasonably estimated recoverable response costs would require each party to pay \$1.29 per pound.

X
Your prompt response to this proposal including a description of EPA's proposed terms of settlement and release of our clients is appreciated. You can direct your response to me and I will distribute it to the other de minimus generators. We request that you keep this proposal confidential from the Rose Chemical Steering Committee.

If you have any questions, please do not hesitate to call me.

Very truly yours,

JOHNSON, LUCAS, BUSH, SNAPP & BURGESS

Sheldon D. Korlin
Sheldon D. Korlin

SDK/dl

Enclosure

cc: Elizabeth Drill, Industrial Oil Tank & Line

Scott Pemberton, Esq.

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Jim Neet, Canton (Mississippi) Municipal Utilities,
Clarksdale,
Mississippi, and Kosciusko (Mississippi) Water & Light
Michael Peters, Jerry's Electric
Stuart Lowry, Kaw Valley Electric & United Electrical
Cooperative
Martha Steincamp, EPA Region VII, Regional Counsel

Clean Sites, Inc.
Rose Chemicals Site
Waste-In Company Ranking Report

Date: 04/06/88

Rank	PRP ID	PRP Name	Total Weight	Pct Of Total	Accum Pctg
1	1604	NEW ENGLAND POWER SERVICE CO	2,616,754	11.2603	11.2603
2	1601	IOWA PUBLIC SERVICE CO	1,370,628	5.8980	17.1583
3	1598	COMMONWEALTH EDISON	1,358,468	5.8457	23.0040
4	1602	KANSAS POWER & LIGHT	1,297,123	5.5817	28.5857
5	1599	ILLINOIS POWER	1,073,559	4.6197	33.2054
6	1504	SOUTHWESTERN ELECTRIC POWER CO.	751,883	3.2355	36.4409
7	1363	NEBRASKA PUBLIC POWER DIST OPER CTR	686,976	2.9562	39.3970
8	1397	OMAHA PUBLIC POWER	675,853	2.9083	42.3053
9	1096	CENTRAL ILL PUBLIC SERVICE	571,399	2.4588	44.7641
10	1605	WEST TEXAS UTILITIES	549,047	2.3626	47.1268
11	1393	OKLAHOMA GAS & ELECTRIC	540,092	2.3241	49.4509
12	1603	LOUISIANA POWER/NEW ORLEANS PUBLIC SVC	538,326	2.3165	51.7674
13	1596	CENTRAL LOUISIANA ELECTRIC CO (CLECO)	459,156	1.9758	53.7432
14	1337	MISSOURI PUBLIC SERVICE	413,430	1.7791	55.5222
15	1600	INTERSTATE POWER	410,018	1.7644	57.2866
16	1597	COLO SPRINGS DEPT OF PUBL UTILITIES	359,148	1.5455	58.8321
17	1259	IOWA POWER & LIGHT CO	293,814	1.2643	60.0964
18	1728	GENERAL MOTORS	280,632	1.2076	61.3040
19	1577	WESTERN AREA POWER ADMIN	208,005	0.8951	62.1991
20	1511	ST LOUIS COUNTY - LCRA	202,055	0.8695	63.0686
21	1551	UNITED POWER ASSOC	197,486	0.8498	63.9184
22	1468	SAVANNAH ELECTRIC	196,140	0.8440	64.7624
23	1088	CAROLINA POWER & LIGHT	191,676	0.8248	65.5872
24	1253	INDUSTRIAL OIL TANK & LINE (INDUS TANK)	169,020	0.7273	66.3145
25	1160	MARYLAND, UNIV. OF	165,541	0.7123	67.0269
26	1080	CAMPBELL SOUP CO	165,186	0.7108	67.7377
27	1546	UGI CORP	159,855	0.6879	68.4256
28	1257	IOWA ELECTRIC LIGHT & POWER	146,768	0.6316	69.0571
29	1334	MINNKOTA POWER (MINN-KOTA)	143,699	0.6184	69.6755
30	1054	BRAZOS ELECTRICAL POWER	142,987	0.6153	70.2908
31	1531	TEXAS ELECTRIC COOP	141,437	0.6086	70.8994
32	1100	CENTRAL POWER & LIGHT	119,260	0.5132	71.4126
33	1116	SPRINGFIELD CITY WATER LT & POWER (CITY)	113,917	0.4902	71.9028
34	1585	WISCONSIN POWER & LIGHT	106,257	0.4572	72.3600
35	1205	GAINESVILLE REGIONAL UTILITIES	97,247	0.4185	72.7785
36	1020	ANR PIPELINE CO	96,820	0.4166	73.1951
37	1261	IOWA-ILLINOIS GAS & ELECTRIC	93,990	0.4045	73.5996
38	1607	KANSAS CITY POWER & LIGHT	93,354	0.4017	74.0013
39	1073	CABOT CORP./HAYNES INTERNATIONAL	93,100	0.4006	74.4019
40	1161	DES MOINES REGISTER	87,946	0.3784	74.7804
41	1110	CHRYSLER WARREN TRUCK PLT-CHRYSLER MOTOR	87,143	0.3750	75.1554

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Clean Sites, Inc.
Rose Chemicals Site
Waste-In Company Ranking Report

Date: 04/06/88

Rank	PRP ID	PRP Name	Total Weight	Pct Of Total	Accum Pctg
42	1671	GSA(TSI)	80,548	0.3466	75.5020
43	1712	TRANSFORMER SERVICE (OHIO), INC (TSI)	78,171	0.3364	75.8384
44	1341	UNION ELECTRIC CO (MISSOURI)	72,001	0.3098	76.1482
45	1304	LOUP RIVER PUBLIC POWER	70,537	0.3035	76.4517
46	1092	CENTEL CORP.-WESTERN POWER	69,782	0.3003	76.7520
47	1555	US TRANSFORMER	68,940	0.2967	77.0487
48	1716	ADDISON CONSTRUCTION (BUR OF RECLAM DOI)	67,752	0.2915	77.3402
49	1536	PETROLEUM & POWER MAINT INC (TPM OHIO)	65,317	0.2811	77.6213
50	1355	NALCO CHEM	64,140	0.2760	77.8973
51	1043	BLACKSTONE VALLEY ELEC (EUA SERVICES)	62,367	0.2684	78.1657
52	1209	GARLAND (CITY OF) (TEXAS)	61,240	0.2635	78.4292
53	1167	EASTERN EDISON (EUA SERVICE CORPORATION)	61,119	0.2630	78.6922
54	1590	WORTHINGTON PUB UTILITIES (MUN.)	60,398	0.2599	78.9521
55	1085	CANTON MUN UTILITIES	55,737	0.2398	79.1919
56	1267	JESS HOWARD ELECTRIC	53,750	0.2313	79.4232
57	1695	N L INDUSTRIES(TSI)	52,546	0.2261	79.6493
58	1266	JERRY ELECTRIC (S DAKOTA)	52,276	0.2250	79.8743
59	1335	MINNESOTA LUMBER & WRECKING	51,931	0.2235	80.0978
60	1522	SUNOHIO (SUN ENVIRONMENTAL)	51,301	0.2208	80.3185
61	1293	LIBERTY MUN ELECTRIC SYSTEM	50,100	0.2156	80.5341
62	1051	BOUILLE ELECTRIC INC (BOVILLE)	46,767	0.2012	80.7354
63	1114	CITIZENS UTILITIES	45,796	0.1971	80.9324
64	1679	JAMESTOWN (CITY OF) BOARD OF PUB UT(TSI)	45,623	0.1963	81.1287
65	1562	VETERANS ADMIN. MED CTR (CAL)	45,096	0.1941	81.3228
66	1035	BBC BROWN BOBER MUNICIP POWER PLANT	45,053	0.1939	81.5167
67	1714	WILLIAM F SULLIVAN & CO INC(TSI)	45,000	0.1936	81.7103
68	1144	CRETE MILLS	44,851	0.1930	81.9033
69	1310	MINNESOTA, STATE OF (MANKATO STATE U)	44,384	0.1910	82.0943
70	1385	N W ELECTRIC POWER COOP	44,300	0.1906	82.2849
71	1180	ERIE MINING CO	43,299	0.1863	82.4713
72	1494	SOLOMON ELECTRIC CO	42,860	0.1844	82.6557
73	1489	SIOUX VALLEY EMPIRE ELECTRIC	42,350	0.1822	82.8379
74	1405	OTTER TAIL POWER CO.	41,800	0.1799	83.0178
75	1316	MASCOUTAH (CITY OF) IL	41,620	0.1791	83.1969
76	1729	JEFFERSON DAVIS ELECTRIC COOP	41,230	0.1774	83.3743
77	1297	LIPSITZ CO	40,724	0.1752	83.5496
78	1486	SIERRA FRUIT CO	40,000	0.1721	83.7217
79	1756	NEW YORK STATE OFF.OF MENTAL HEALTH(TSI)	39,342	0.1693	83.8910
80	1734	WISCONSIN PUBLIC SERVICE	39,341	0.1693	84.0603
81	1719	CHATTANOOGA ELEC POWER BD (ELECT BD OF)	38,575	0.1660	84.2263
82	1274	KAW VALLEY ELECTRIC	37,430	0.1611	84.3873

Clean Sites, Inc.
Rose Chemicals Site
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Rank	PRP ID	PRP Name	Total Weight	Pct Of Total	Accum Pctg
83	1464	SAN ANTONIO CITY PUBLIC SERVICE	37,016	0.1593	84.5466
84	1461	SACRAMENTO MUN	36,830	0.1585	84.7051
85	1295	LINCOLN ELECTRIC SYSTEMS	36,825	0.1585	84.8636
86	1278	KIT CARSON ELECTRIC	35,043	0.1508	85.0144
87	1580	WHEATLAND ELECTRIC	34,783	0.1497	85.1640
88	1219	GREAT LAKES STEEL (NATIONAL STEEL)	33,800	0.1454	85.3095
89	1448	ROCHESTER PUBLIC UTILITIES	33,459	0.1440	85.4535
90	1537	TRANSFORMER PROTECTIVE MAINTENANCE(N.H.)	33,407	0.1438	85.5972
91	1331	MIDWEST ENERGY INC (KS)	31,566	0.1358	85.7330
92	1137	CONSUMERS POWER CO	31,200	0.1343	85.8673
93	1031	BANGOR HYDRO ELECTRIC	30,759	0.1324	85.9997
94	1309	MAINE PUBLIC SERVICE CO	30,721	0.1322	86.1319
95	1521	SUNBELT TRANSFORMERS	30,200	0.1300	86.2618
96	1432	PLUMAS-SIERRA RURAL ELECTRIC	29,737	0.1280	86.3898
97	1384	NORTHWESTERN BELL TELEPHONE CO (NW BELL)	29,190	0.1256	86.5154
98	1544	TWIN COUNTY ELECTRIC POWER ASSOC	29,150	0.1254	86.6408
99	1336	MISSOURI GRAVEL CO	27,479	0.1182	86.7591
100	1060	BROOKLYN UNION GAS (BROOKLAND)	27,403	0.1179	86.8770
101	1370	NEWKIRK ELECTRIC	27,337	0.1176	86.9946
102	1003	ALABAMA ELECTRIC COOP INC	26,944	0.1159	87.1106
103	1422	PIERRE MUN POWER & LIGHT	26,819	0.1154	87.2260
104	1238	HIGHLINE ELECTRIC ASSOC	26,720	0.1150	87.3410
105	1543	TWIN CITY ELECTRIC	26,600	0.1145	87.4554
106	1046	BLUE RIDGE ELECTRIC COOP	26,101	0.1123	87.5677
107	1034	BASIN ELECTRIC POWER COOP	24,574	0.1057	87.6735
108	1016	AMES MUN UTILITY	24,269	0.1044	87.7779
109	1452	ROCKWELL INTERNATIONAL	24,200	0.1041	87.8821
110	1129	COLBY MUN	24,085	0.1036	87.9857
111	1163	DETROIT LAKES MUN UTILITIES	23,982	0.1032	88.0889
112	1126	COASTAL STATES CRUDE GATHERING CO.	23,258	0.1001	88.1890
113	1300	LOGAN CITY MUN LIGHT	23,214	0.0999	88.2889
114	1255	INTERNATIONAL FLAVOR & FRAGRANCE	23,063	0.0992	88.3881
115	1459	RUSTON UTILITIES SYSTEM	22,939	0.0987	88.4868
116	1245	HONEYWELL INC (MINN)	22,831	0.0982	88.5851
117	1268	JONES PETROLEUM CO-JONES OIL CO.	22,500	0.0968	88.6819
118	1443	RECOVERY SPECIALISTS INC	22,216	0.0956	88.7775
119	1254	INTERCOUNTY ELECTRIC COOP	22,180	0.0954	88.8729
120	1055	BREMEN ELECTRIC	21,436	0.0922	88.9652
121	1132	COLORADO ELECTRIC COIL	21,389	0.0920	89.0572
122	1152	DECATUR UTILITIES	21,384	0.0920	89.1492
123	1721	DEPT. OF ARMY (ROCK ISL. ARSENAL)	20,880	0.0898	89.2391

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Rank	PRP ID	PRP Name	Total Weight	Pct Of Total	Accum Pctg
124	1438	LETOURNEA CONSTRUCTION CO(R-G LETOURNEA)	20,641	0.0888	89.3279
125	1094	CENTRAL ELECTRIC POWER COOP (PA)	20,502	0.0882	89.4161
126	1416	PEABODY CLEAN IND	20,441	0.0880	89.5041
127	1419	PHASE APPLICATIONS	20,315	0.0874	89.5915
128	1326	METALLURGICAL INC	20,200	0.0869	89.6784
129	1288	LAWSON'S MILK CO. (LANSON)	19,810	0.0852	89.7637
130	1029	AZUSA (CITY OF) (CALIFORNIA)	19,330	0.0832	89.8469
131	1104	CHAMPION INTERNATIONAL CORP	19,122	0.0823	89.9291
132	1660	CROUSE HINDS ELEC CONSTR MATERIAL(TSI)	19,050	0.0820	90.0111
133	1006	ALEXANDRIA LIGHT & POWER	18,990	0.0817	90.0928
134	1277	KEY WEST UTILITY BOARD	18,695	0.0804	90.1733
135	1709	SIMKINS INDUSTRIES(TSI)	18,634	0.0802	90.2535
136	1661	DIAMOND INTERNATIONAL (TSOI) (TSI)	18,600	0.0800	90.3335
137	1686	LYMAN DYEING AND FINISHING CO(TSI)	18,600	0.0800	90.4135
138	1752	WILLAMETTE IND INC (SUNBELT TF-WILLOMET)	18,560	0.0799	90.4934
139	1015	AMERICAN SALT	18,089	0.0778	90.5712
140	1683	LETCHWORTH VILLAGE DEVELOP CENTER(TSI)	17,900	0.0770	90.6483
141	1507	SAINT BARNABAS MED CTR (ST BARNABUS HSP)	17,700	0.0762	90.7244
142	1365	NEC INC (LYONS DIV)	17,688	0.0761	90.8006
143	1691	MASSACHUSETTS INSTITUTE OF TECH(TSI)	17,300	0.0744	90.8750
144	1542	TUPELO WATER & LT. (TUEPELO)	16,693	0.0718	90.9468
145	1720	CHERRY-BURRELL CORP. (NELSON ELECTRIC)	16,492	0.0710	91.0178
146	1526	TALLAHASSEE (CITY OF)	16,477	0.0709	91.0887
147	1749	NISHNABOTNA VALLEY REC (IAEC)	16,134	0.0694	91.1581
148	1117	CLARK ELECTRIC COOP INC	15,804	0.0680	91.2261
149	1678	JAMES RIVER CORP(TSI)	15,800	0.0680	91.2941
150	1273	KANSAS (UNIVERSITY OF)	15,750	0.0678	91.3619
151	1730	LENOIR CITY UTIL.S BD (POWER ENG & TEST)	15,713	0.0676	91.4295
152	1700	PELLON CORP(TSI)	15,300	0.0658	91.4954
153	1097	CENTRAL IOWA POWER COOP (CIPCO) (IAEC)	15,243	0.0656	91.5609
154	1479	SHAWANO MUN UTILITIES	15,225	0.0655	91.6265
155	1040	BENSON (CITY OF) MN	15,134	0.0651	91.6916
156	1195	FORT COLLINS POWER & LIGHT	15,124	0.0651	91.7567
157	1207	GARDEN CITY MUN	15,013	0.0646	91.8213
158	1250	IDAHO FALLS (CITY OF)	14,893	0.0641	91.8854
159	1249	L. WILSON POWER CORP (HUNT. DEV.)	14,863	0.0640	91.9493
160	1066	BURBANK (CITY OF)	14,718	0.0633	92.0127
161	1589	WORTHINGTON DRESSER CO	14,673	0.0631	92.0758
162	1294	LIGHTHOUSE ELECTRIC COOP	14,514	0.0625	92.1382
163	1061	BROWN ATCHISON COOP	14,510	0.0624	92.2007
164	1352	MURRAY TURBOMACHINERY	14,475	0.0623	92.2630

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Clean Sites, Inc.
Rose Chemicals Site
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Date: 04/06/88

Rank	PRP ID	PRP Name	Total Weight	Pct Of Total	Accum Pctg
165	1650	AMERICAN HOECHST CORPORATION(TSI)	14,430	0.0621	92.3251
166	1666	FEDERATED FRY METALS(TSI)	14,200	0.0611	92.3862
167	1318	MASTER MAINTENANCE	13,800	0.0594	92.4456
168	1550	UNITED ELECTRIC COOP	13,736	0.0591	92.5047
169	1371	NINNESCAH RURAL ELECTRIC (NINNESEH ELEC)	13,670	0.0588	92.5635
170	1151	DEAN FOODS COMPANY	13,648	0.0587	92.6222
171	1242	HOLLAND BOARD OF PUBLIC WORKS	13,613	0.0586	92.6808
172	1030	B-K ELECTRIC COOP	13,590	0.0585	92.7393
173	1325	METAL MATIC (MINN MN)	13,085	0.0563	92.7956
174	1510	ST JOSEPH LIGHT & POWER	13,072	0.0563	92.8518
175	1576	WESTERN COOP ELECTRIC	12,938	0.0557	92.9075
176	1276	KENNEDY IND	12,890	0.0555	92.9630
177	1306	LOWER YELLOWSTONE ELECTRIC ASSOC	12,826	0.0552	93.0182
178	1588	WOODBURY COUNTY REC	12,780	0.0550	93.0732
179	1145	CRETE MUN UTILITIES	12,751	0.0549	93.1280
180	1169	EASTON UTILITIES COMMISSION	12,735	0.0548	93.1828
181	1595	YW ELECTRIC ASSOC INC	12,705	0.0547	93.2375
182	1101	CENTRAL STONE COMPANY	12,500	0.0538	93.2913
183	1400	ORANGE & ROCKLAND UTILITIES	12,460	0.0536	93.3449
184	1172	EDISON SAULT ST MARIE	12,447	0.0536	93.3985
185	1305	LOVELAND (CITY OF)	12,132	0.0522	93.4507
186	1192	FLORIDA KEYS ELECTRIC COOP	12,120	0.0522	93.5028
187	1409	PACKAGING CORP OF AMERICA	12,040	0.0518	93.5546
188	1656	COMMONWEALTH ELEC CO(TSI)	12,000	0.0516	93.6063
189	1750	SOUTH CRAWFORD REC (IAEC)	11,789	0.0507	93.6570
190	1234	HELPER INC	11,703	0.0504	93.7074
191	1124	CMS ELECTRIC	11,700	0.0503	93.7577
192	1106	GUYON GENERAL PIPING INC(CHARLES GUYSON)	11,679	0.0503	93.8080
193	1444	REYNOLDS METALS (REYNOLDS ALUMINUM)	11,500	0.0495	93.8575
194	1515	STERLING ELECTRIC	11,418	0.0491	93.9066
195	1500	SOUTHERN MARYLAND ELECTRIC COOP INC	11,141	0.0479	93.9545
196	1199	FOX ISLANDS ELECTRIC COOP	11,054	0.0476	94.0021
197	1135	CONCORDIA ELECTRIC COOP	11,014	0.0474	94.0495
198	1147	DALLAS (CITY OF)	10,860	0.0467	94.0962
199	1427	PITTSBURGH-DES MOINES	10,850	0.0467	94.1429
200	1495	SOUTH CAROLINA (UNIVERSITY OF)	10,760	0.0463	94.1892
201	1465	SAN BERNARD ELECTRIC	10,656	0.0459	94.2351
202	1708	SALMON RIVER SCHOOL(TSI)	10,650	0.0458	94.2809
203	1214	GLADES ELECTRIC COOP	10,540	0.0454	94.3263
204	1451	ROCKPORT BOARD OF PUBLIC UTILITIES	10,422	0.0448	94.3711
205	1609	S.E. IOWA COOP ELECT ASSN (IAEC)	10,293	0.0443	94.4154

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Date: 04/06/88

Rank	PRP ID	PRP Name	Total Weight	Pct Of Total	Accum Pctg
206	1424	PIONEER ELECTRIC COOP	10,126	0.0436	94.4590
207	1654	NEW ENGLAND GROCERS (TSI)	10,040	0.0432	94.5022
208	1753	TECUMSEH UTILITY AUTHORITY	9,945	0.0428	94.5450
209	1349	MORRISVILLE (VILLAGE OF)	9,932	0.0427	94.5877
210	1314	MARSHALL COUNTY REC (IAEC)	9,880	0.0425	94.6302
211	1532	THUMB ELECTRIC	9,745	0.0419	94.6722
212	1218	GRAND ISLAND ELECTRIC DEPT	9,709	0.0418	94.7139
213	1246	HOOSIER ENERGY	9,520	0.0410	94.7549
214	1518	SUBSTATION TESTING SERVICE INC	9,364	0.0403	94.7952
215	1655	BROOME CITY DEPT OF PUB WORK(TSI)	9,300	0.0400	94.8352
216	1089	CASS COUNTY ELECTRIC COOP	9,235	0.0397	94.8750
217	1196	FORT PIERCE UTILITY AUTH(FT PEARCE CITY)	9,100	0.0392	94.9141
218	1210	GARWOOD PAPERBOARD MILL CO	9,075	0.0391	94.9532
219	1740	PLYMOUTH ELECTRIC COOP (IAEC)	8,708	0.0375	94.9906
220	1275	L E MYERS CO (KEITH ELECTRIC)	8,625	0.0371	95.0278
221	1687	MAINE PUBLIC SERVICE(TSI)	8,600	0.0370	95.0648
222	1200	FRANKFORT CITY POWER & LIGHT (IND)	8,587	0.0370	95.1017
223	1707	ST JOSEPH HOSPITAL(TSI)	8,540	0.0367	95.1385
224	1063	BRYAN (CITY OF) (TEXAS)	8,475	0.0365	95.1749
225	1467	SANBORN MUN (IOWA)	8,441	0.0363	95.2113
226	1698	PUBLIC SERVICE OF N H(TSI)	8,400	0.0361	95.2474
227	1477	SEQUIN ELECTRIC	8,390	0.0361	95.2835
228	1539	TRI COUNTY ELECTRIC COOP	8,356	0.0360	95.3195
229	1567	WATERTOWN MUN	8,312	0.0358	95.3552
230	1481	SHENANDOAH VALLEY ELECTRIC COOP	8,273	0.0356	95.3908
231	1704	REPUBLIC STEEL/LTV (TSOI) (TSI)	8,158	0.0351	95.4259
232	1243	HOLYOKE GAS & ELECTRIC DEPT	8,148	0.0351	95.4610
233	1517	STEWART & STEVENSON	8,080	0.0348	95.4958
234	1411	PANOLA-HARRISON ELECTRIC COOP	7,982	0.0343	95.5301
235	1403	ORRVILLE (CITY OF) (OHIO)	7,980	0.0343	95.5644
236	1484	SIDNEY ELECTRIC UTILITY	7,862	0.0338	95.5983
237	1330	MID MO ELECTRIC CO	7,802	0.0336	95.6319
238	1658	CORNING GLASS WORKS(TSI)	7,800	0.0336	95.6654
239	1362	NAVOPACHE ELECTRIC COOP, INC.	7,752	0.0334	95.6988
240	1503	SOUTHWESTERN ELECTRIC COOP	7,708	0.0332	95.7319
241	1572	WEBSTER CITY MUN. LT. & POWER (CITY OF)	7,670	0.0330	95.7650
242	1333	MINN-DAK FARMERS COOP	7,455	0.0321	95.7970
243	1663	EASTERN MAINE ELEC CORP INC(TSI)	7,400	0.0318	95.8289
244	1608	O K ELECTRIC	7,380	0.0318	95.8606
245	1133	COMMUNITY ELECTRIC COOP	7,375	0.0317	95.8924
246	1185	FARMINGTON ELECTRIC UTILITIES	7,353	0.0316	95.9240

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Rank	PRP ID	PRP Name	Total Weight	Pct Of Total	Accum Pctg
247	1458	RUNESTONE ELECTRIC COOP	7,315	0.0315	95.9555
248	1247	HOULTON WATER CO (MAINE)	7,307	0.0314	95.9869
249	1383	NORTON DECATOR	7,226	0.0311	96.0180
250	1535	TRANSCYCLE IND INC	7,135	0.0307	96.0487
251	1670	GCA CORP(TSI)	7,050	0.0303	96.0791
252	1146	DAKOTA ELECTRIC ASSOC	7,026	0.0302	96.1093
253	1396	U S ARMY FT RANDALL DAM (OMAHA DIST COE)	6,923	0.0298	96.1391
254	1488	SIOUX ELECTRIC COOP ASSOC	6,892	0.0297	96.1687
255	1131	COLLEGE STATION UTILITIES	6,875	0.0296	96.1983
256	1232	HART HYDROELECTRIC DEPT (CITY OF)	6,843	0.0294	96.2278
257	1048	BOESE HILBURN ELECTRIC SERV CO	6,736	0.0290	96.2568
258	1445	RICHMOND POWER & LIGHT	6,683	0.0288	96.2855
259	1203	FORT PIERCE GROWERS ASSOC(INDIAN HARBOR)	6,650	0.0286	96.3141
260	1156	DELTA ELECTRIC POWER	6,616	0.0285	96.3426
261	1140	COOK COUNTY ELECTRIC COOP ASSOC	6,604	0.0284	96.3710
262	1344	MOORHEAD PUBLIC SERVICE DEPT (MOOREHEAD)	6,597	0.0284	96.3994
263	1513	ST. MARY'S LODGE-ST. MARY'S RB, INC.	6,500	0.0280	96.4274
264	1157	DELTA MONTROSE ELECTRIC	6,459	0.0278	96.4552
265	1382	NORTHERN VIRGINIA ELECTRIC COOP	6,310	0.0272	96.4823
266	1404	ORTONVILLE WATER & LIGHT DEPT (MO BASIN)	6,293	0.0271	96.5094
267	1102	CENTRAL VALLEY ELECTRIC COOP	6,225	0.0268	96.5362
268	1407	OWENSBORO MUN	6,155	0.0265	96.5627
269	1482	SHILOH BOARD OF PUBLIC AFFAIRS	6,124	0.0264	96.5890
270	1002	FARGO PUBLIC SCHOOLS (AGASIG JH)	6,118	0.0263	96.6154
271	1499	SOUTHERN CALIFORNIA WATER CO	6,088	0.0262	96.6416
272	1220	GREAT PLAINS ELECTRIC CORP	6,039	0.0260	96.6675
273	1118	CLARKSDALE MISSISSIPPI	5,988	0.0258	96.6933
274	1369	NEW SMYRNA BEACH UTILITIES COMM	5,980	0.0257	96.7190
275	1674	GUNLOCKE COMPANY,THE(TSI)	5,880	0.0253	96.7443
276	1187	FERGUS ELECTRIC	5,855	0.0252	96.7695
277	1701	PEN YAN SCHOOL DIST(TSI)	5,800	0.0250	96.7945
278	1406	OWATONNA PUBLIC UTILITIES	5,788	0.0249	96.8194
279	1436	PRIMGHAR (CITY OF)	5,763	0.0248	96.8442
280	1680	KATAHDIN TRUST CO(TSI)	5,700	0.0245	96.8687
281	1354	N REN CORP	5,610	0.0241	96.8929
282	1109	CHICOPEE ELECTRIC LIGHT DEPT	5,588	0.0240	96.9169
283	1302	LOMPOC (CITY OF) (CALIFORNIA)	5,560	0.0239	96.9408
284	1414	PASADENA (CITY OF)	5,560	0.0239	96.9648
285	1520	SUMTER CO ELECTRIC COOP	5,559	0.0239	96.9887
286	1093	CENTRAL ELECTRIC POWER ASSOC (MISS)	5,469	0.0235	97.0122
287	1423	PILLSBURY CO	5,357	0.0231	97.0353

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Rank	PRP ID	PRP Name	Total Weight	Pct Of Total	Accum Pctg
288	1713	US ARMY FORT DRUM (TSI)	5,300	0.0228	97.0581
289	1748	ADAMS COUNTY COOP ELECTRIC (IAEC)	5,264	0.0227	97.0807
290	1361	NAVARRO COUNTY ELECTRIC COOP INC	5,224	0.0225	97.1032
291	1216	GONZALEZ (CITY OF) TEXAS	5,213	0.0224	97.1256
292	1394	OKOLONA ELECTRIC DEPT	5,138	0.0221	97.1478
293	1123	CMI CAST PARTS INC	5,135	0.0221	97.1699
294	1497	SOUTH DAKOTA SCHOOL OF MINES & TECH	5,115	0.0220	97.1919
295	1139	CONWED (CONWEB)	5,027	0.0216	97.2135
296	1222	GRINNELL-NEWBERG COMMUNITY SCHOOL (IOWA)	4,980	0.0214	97.2349
297	1052	BOYLSTON MUN LIGHT DEPT. (BOYLETON)	4,974	0.0214	97.2563
298	1260	IOWA STATE FAIRGROUNDS	4,974	0.0214	97.2777
299	1226	GUTHRIE COUNTY REC (IAEC)	4,955	0.0213	97.2991
300	1553	US ARMY FORT PECK POWER PLANT	4,943	0.0213	97.3203
301	1050	BOSSIER RURAL ELECTRIC	4,935	0.0212	97.3416
302	1164	DICKENS ELECTRIC COOP	4,887	0.0210	97.3626
303	1286	LAMBERT ELECTRIC	4,860	0.0209	97.3835
304	1523	SUPERIOR UTILITIES (LIGHT DEPT.)	4,860	0.0209	97.4044
305	1111	CHURCHVILLE (VILLAGE OF)	4,843	0.0208	97.4253
306	1179	ENVIRONMENTAL INTERNATIONAL/CWM	4,806	0.0207	97.4459
307	1075	CALHOUN (CITY OF)	4,800	0.0207	97.4666
308	1311	MANSFIELD ELECTRIC CO	4,740	0.0204	97.4870
309	1279	KOOTENAI ELECTRIC COOP	4,715	0.0203	97.5073
310	1570	WAVERLY MUN ELECTRIC	4,710	0.0203	97.5276
311	1673	GUILDERLAND HIGH SCHOOL(TSI)	4,700	0.0202	97.5478
312	1692	MCNEIL AND ASSOCIATES(TSI)	4,700	0.0202	97.5680
313	1202	FREMONT DEPT OF UTILITIES	4,693	0.0202	97.5882
314	1401	ORANGE CITY MUN	4,620	0.0199	97.6081
315	1347	MOR-GRAN-SOU ELECTRIC COOP INC	4,610	0.0198	97.6279
316	1470	SCM CORP	4,505	0.0194	97.6473
317	1026	AUBURN BOARD OF PUBLIC WORKS	4,500	0.0194	97.6667
318	1328	MIAMI-CASS COUNTY REMC IN	4,500	0.0194	97.6860
319	1237	HIGHLAND ELECTRIC LIGHT DEPT	4,485	0.0193	97.7053
320	1285	LAMB COUNTY ELECTRIC CO	4,464	0.0192	97.7245
321	1387	N W MISSOURI STATE (UNIVERSITY OF)	4,446	0.0191	97.7437
322	1001	A P GREEN REFRACTORIES CO (A P GRACE)	4,375	0.0188	97.7625
323	1374	NOBLE COUNTY REMC IN	4,350	0.0187	97.7812
324	1426	PIONEER RURAL ELECTRIC COOP	4,305	0.0185	97.7997
325	1287	LANE SCOTT	4,296	0.0185	97.8182
326	1049	BONNERS FERRY	4,290	0.0185	97.8367
327	1559	VERO BEACH (CITY OF) (FLORIDA)	4,264	0.0183	97.8550
328	1064	BUCHANAN COUNTY REC (IAEC)	4,251	0.0183	97.8733

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Rank	PRP ID	PRP Name	Total Weight	Pct Of Total	Accum Pctg
329	1191	FLETCHER-REINHARDT CO	4,207	0.0181	97.8914
330	1289	LAPORTE CITY UTILITIES	4,200	0.0181	97.9095
331	1682	LEHIGH UNIVERSITY(TSI)	4,200	0.0181	97.9276
332	1235	HENDRICKS CO REMC	4,108	0.0177	97.9453
333	1574	WEST CENTRAL ELECTRIC	4,102	0.0177	97.9629
334	1186	FEDERAL MOGUL CORP	4,075	0.0175	97.9804
335	1211	GASCOSAGE	4,020	0.0173	97.9977
336	1176	EMERSON ELECTRIC CO	4,000	0.0172	98.0150
337	1690	MARY HITCHCOCK MEM HOSPITAL(TSI)	4,000	0.0172	98.0322
338	1041	BENSON ELECTRIC (ST LOUIS)	3,996	0.0172	98.0494
339	1524	SUTTON ENGINEERING	3,990	0.0172	98.0665
340	1236	HENRY CO REMC (IND)	3,980	0.0171	98.0837
341	1743	CHEROKEE COUNTY ELECTRIC COOP (IAEC)	3,960	0.0170	98.1007
342	1150	DAWSON PUBLIC POWER	3,950	0.0170	98.1177
343	1204	FULTON CO REMC	3,934	0.0169	98.1346
344	1228	HANCOCK CITY REMC (IND)	3,920	0.0169	98.1515
345	1023	ASSOCIATED ELECTRIC COOP	3,912	0.0168	98.1683
346	1345	MINNESOTA, STATE OF (MOORHEAD STATE U)	3,880	0.0167	98.1850
347	1201	FRED HAHN AUTO BODY (SPIRIT LAKE)	3,872	0.0167	98.2017
348	1027	AUSTIN STATE SCHOOL	3,850	0.0166	98.2183
349	1184	FARMERS RURAL ELECTRIC COOP (KENTUCKY)	3,840	0.0165	98.2348
350	1223	GRUNDY ELECTRIC COOP	3,830	0.0165	98.2513
351	1359	NATIONAL ELECTRIC	3,788	0.0163	98.2676
352	1339	MISSOURI, UNIV. (MO UNIV OF)	3,786	0.0163	98.2838
353	1492	SNYDER (VILLAGE OF)	3,782	0.0163	98.3001
354	1379	NORTHEAST LOUISIANA POWER COOP	3,747	0.0161	98.3162
355	1162	DES MOINES WATER WORKS	3,700	0.0159	98.3322
356	1083	CANEY VALLEY ELECTRIC COOP ASSOC INC	3,657	0.0157	98.3479
357	1558	VERMILLION LIGHT DEPT (CITY OF)	3,648	0.0157	98.3636
358	1032	BARC ELECTRIC COOP	3,618	0.0156	98.3792
359	1028	AUSTIN UTILITIES	3,600	0.0155	98.3947
360	1506	SPRINGFIELD CITY UTIL(MO) (SPRING FIELD)	3,600	0.0155	98.4102
361	1307	MACON ELECTRIC COOP (MISSOURI)	3,586	0.0154	98.4256
362	1478	SEWARD (CITY OF) (NEBRASKA)	3,523	0.0152	98.4407
363	1556	VALLEY ELECTRIC	3,501	0.0151	98.4558
364	1417	PELLETIER ELECTRIC CO	3,500	0.0151	98.4709
365	1530	TECUMSEH DEPT. OF UTILITIES (NEB)	3,500	0.0151	98.4859
366	1672	GATES-CHILI SCHOOL DISTRICT(TSI)	3,490	0.0150	98.5009
367	1125	CO MO ELECTRIC COOP INC	3,479	0.0150	98.5159
368	1450	ROCK RAPIDS MUN	3,381	0.0145	98.5305
369	1271	KANDIYOHIO COOP ELECTRIC POWER ASSOC	3,340	0.0144	98.5448

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Rank	PRP ID	PRP Name	Total Weight	Pct Of Total	Accum Pctg
370	1469	SCHUYLER DEPT OF UTILITIES (NE)	3,324	0.0143	98.5591
371	1731	FARMERS ELECTRIC COOP INC. (MISSOURI)	3,301	0.0142	98.5734
372	1501	SOUTHERN NEBRASKA RURAL PUBLIC	3,240	0.0139	98.5873
373	1194	FORT BELKNAP ELECTRIC COOP	3,197	0.0138	98.6010
374	1197	FOUNTAIN ELECTRIC DEPT (FOUNTAIN CITY)	3,172	0.0136	98.6147
375	1498	SOUTH SIDE ELECTRIC COOP	3,166	0.0136	98.6283
376	1327	METRO MED CTR (MINN, MN)	3,160	0.0136	98.6419
377	1262	JACKSON (CITY OF)	3,154	0.0136	98.6555
378	1324	MEREDITH BURDA CORP (IOWA)	3,066	0.0132	98.6687
379	1412	PAOLI (CITY OF)	3,065	0.0132	98.6819
380	1677	J D CAHILL, INC(TSI)	3,053	0.0131	98.6950
381	1430	PLATTE CLAY ELECTRIC COOP	2,993	0.0129	98.7079
382	1428	PLAINS ELECTRIC COOP	2,974	0.0128	98.7207
383	1460	SABETHA (CITY OF)	2,949	0.0127	98.7334
384	1557	VAN BUREN LIGHT & POWER DIST	2,920	0.0126	98.7459
385	1681	LAKE PLACID MUNICIPAL ELEC DEPT(TSI).	2,900	0.0125	98.7584
386	1062	BROWNFIELD (CITY OF)	2,899	0.0125	98.7709
387	1343	MOBIL OIL CORP. (MOBILE OIL)	2,892	0.0124	98.7833
388	1025	ATHENS ELECTRIC DEPT	2,860	0.0123	98.7957
389	1667	FENNER AMERICA, INC(TSI)	2,850	0.0123	98.8079
390	1496	SOUTH CENTRAL ELECTRIC ASSOC	2,791	0.0120	98.8199
391	1168	EASTERN IOWA LIGHT & POWER (IAEC)	2,786	0.0120	98.8319
392	1392	OKANOGAN COUNTY PUD	2,770	0.0119	98.8438
393	1229	HANNIBAL (CITY OF) BOARD OF PUBLIC WORKS	2,763	0.0119	98.8557
394	1074	CALDWELL (CITY OF)	2,724	0.0117	98.8674
395	1447	ROBSTOWN (CITY OF) UTILITIES	2,720	0.0117	98.8791
396	1593	WYRULEC CO	2,720	0.0117	98.8909
397	1292	LEBANON MUN LIGHT DEPT	2,645	0.0114	98.9022
398	1159	DENISON MUNICIPAL	2,615	0.0113	98.9135
399	1744	PELLA COOP ELECTRIC (IAEC)	2,597	0.0112	98.9247
400	1042	BLACK RIVER FALLS MUN ELECTRIC & WATER	2,560	0.0110	98.9357
401	1493	SOCORRO ELECTRIC COOP INC	2,460	0.0106	98.9463
402	1425	PIONEER POWER & LIGHT	2,410	0.0104	98.9566
403	1475	SEDGWICK COUNTY (SEDWICK)	2,405	0.0103	98.9670
404	1244	HOMART DEVELOPMENT (MINN)	2,400	0.0103	98.9773
405	1685	LONG ISLAND RAILROAD(TSI)	2,400	0.0103	98.9876
406	1746	LINN COUNTY REC (IAEC)	2,359	0.0102	98.9978
407	1084	CANNELTON UTILITIES	2,357	0.0101	99.0079
408	1087	CARL BOLANDER	2,349	0.0101	99.0180
409	1415	PASCOAG (RI) FIRE & DIST	2,315	0.0100	99.0280
410	1433	POCAHONTAS MUN ELECTRIC	2,315	0.0100	99.0380

Rank	PRP ID	PRP Name	Total Weight	Pct Of Total	Accum Pctg
411	1573	WEBSTER CITY PRODUCTS/BELDING PRODUCTS	2,300	0.0099	99.0479
412	1095	CENTRAL ELECTRIC (LA)	2,280	0.0098	99.0577
413	1189	FIRST BAPTIST CHURCH (PINEVILLE LA)	2,240	0.0096	99.0673
414	1457	RSR ELECTRIC COOP	2,230	0.0096	99.0769
415	1108	CHESAPEAKE LIGHT & WATER CO	2,220	0.0096	99.0865
416	1069	BURWELL MUN UTILITIES	2,170	0.0093	99.0958
417	1381	NORTHERN NECK ELECTRIC COOP	2,162	0.0093	99.1051
418	1315	MARYSVILLE (CITY OF) (KS)	2,160	0.0093	99.1144
419	1230	HARBOR SPRINGS	2,142	0.0092	99.1236
420	1098	CENTRAL MISSOURI ELECTRIC COOP	2,117	0.0091	99.1327
421	1280	KOSCIUSKO WATER & LIGHT	2,115	0.0091	99.1418
422	1299	LOCKHART PUBLIC UTILITY	2,115	0.0091	99.1509
423	1022	ARNOLD (VILLAGE OF)	2,095	0.0090	99.1599
424	1446	ROBERTSON ELECTRIC CO	2,080	0.0090	99.1689
425	1149	DAVID CITY LIGHT & WATER	2,061	0.0089	99.1778
426	1141	COVINGTON ELECTRIC DEPT	2,054	0.0088	99.1866
427	1366	NEGAUNEE (CITY OF)	2,035	0.0088	99.1954
428	1010	ALLIANCE MUN ELECTRIC DEPT	2,012	0.0087	99.2040
429	1070	BUTLER & LAND INC	2,004	0.0086	99.2126
430	1441	RAPPAHANNOCK ELECTRIC COOP	2,002	0.0086	99.2213
431	1502	SOUTH NORWALK ELEC WKS (2ND TAXING DIST)	2,000	0.0086	99.2299
432	1578	WHARTON COUNTY ELECTRIC COOP INC	2,000	0.0086	99.2385
433	1715	WILLIAMS COLLEGE(TSI)	2,000	0.0086	99.2471
434	1212	GETTY OIL	1,999	0.0086	99.2557
435	1581	WHITE RIVER ELECTRIC	1,982	0.0085	99.2642
436	1380	NORTHERN ELECTRIC COOP	1,980	0.0085	99.2727
437	1710	S C DEPT OF MENTAL RETARDATION(TSI)	1,975	0.0085	99.2812
438	1747	BENTON COUNTY ELECTRIC COOP (IAEC)	1,971	0.0085	99.2897
439	1039	MINNESOTA, STATE OF (BEMIDJI STATE U)	1,950	0.0084	99.2981
440	1241	HOLDEN (TOWN OF) LIGHT DEPT (MASS)	1,950	0.0084	99.3065
441	1078	CAMBRIDGE LIGHT & POWER	1,943	0.0084	99.3148
442	1183	FARMERS ELECTRIC COOP INC (TEXAS)	1,930	0.0083	99.3232
443	1175	ELKHORN RURAL PUBLIC POWER DIST	1,900	0.0082	99.3313
444	1402	ORCAS POWER & LIGHT	1,875	0.0081	99.3394
445	1739	GREENE COUNTY REC (IAEC)	1,874	0.0081	99.3475
446	1269	K ELECTRIC CO	1,860	0.0080	99.3555
447	1569	WATTS REGULATOR CO	1,850	0.0080	99.3634
448	1239	HILLS MATERIALS (RAPID CITY SD)	1,840	0.0079	99.3713
449	1283	LACLEDE CHAIN MFG	1,840	0.0079	99.3793
450	1321	MCLENNAN COUNTY (TX)	1,810	0.0078	99.3871
451	1560	VERSAILLES BD OF PUBLIC AFFAIRS (OHIO)	1,793	0.0077	99.3948

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452	1077	CALLAWAY ELECTRIC COOP (MO)	1,786	0.0077	99.4025
453	1155	DELMARVA POWER & LIGHT CO	1,780	0.0077	99.4101
454	1071	BUTLER RURAL ELECTRIC (KS)	1,740	0.0075	99.4176
455	1272	KANKAKEE VALLEY REMC	1,723	0.0074	99.4250
456	1282	KSTP RADIO (ST PAUL MINN)	1,723	0.0074	99.4324
457	1514	STARK ELECTRIC INC	1,688	0.0073	99.4397
458	1487	SIOUX CENTER MUN UTILITIES	1,686	0.0073	99.4469
459	1120	CLINTON VILLAGE	1,685	0.0073	99.4542
460	1390	OBERLIN MUN LIGHT & POWER SYSTEM	1,685	0.0073	99.4614
461	1375	NORTH AMERICAN PHILIPS (AMER. PHILLIPS)	1,646	0.0071	99.4685
462	1076	CALLAWAY ELECTRIC (NE)	1,632	0.0070	99.4756
463	1320	MCCONE ELECTRIC COOP INC	1,629	0.0070	99.4826
464	1019	ANOKA ELECTRIC COOP	1,613	0.0069	99.4895
465	1490	SMOKY HILL ELECTRIC COOP	1,600	0.0069	99.4964
466	1018	AMORY ELECTRIC WATER DEPT	1,595	0.0069	99.5033
467	1103	CENTRAL VIRGINIA ELECTRIC	1,570	0.0068	99.5100
468	1181	ESTES PARK LIGHT & POWER (COLO)	1,530	0.0066	99.5166
469	1408	OXFORD PROPERTIES INC	1,520	0.0065	99.5231
470	1323	MECKLENBURG ELECTRIC COOP (VA)	1,509	0.0065	99.5296
471	1480	SHELBY COUNTY REMC (SHELLY CITY)	1,502	0.0065	99.5361
472	1697	NORWALK 3RD TAXING DIST. ELECT DEPT(TSI)	1,500	0.0065	99.5425
473	1699	PARK CHANDLER REALTY TRUST(TSI)	1,500	0.0065	99.5490
474	1755	NORWALK ELECTRIC COMPANY (TSI)	1,500	0.0065	99.5555
475	1454	ROSEBUD ELECTRIC COOP	1,455	0.0063	99.5617
476	1540	TROY WATER & LT. DEPT (CITY OF)	1,452	0.0062	99.5680
477	1138	CONTINENTAL DIVIDE ELECTRIC	1,450	0.0062	99.5742
478	1664	EMHART CORP(TSI)	1,425	0.0061	99.5803
479	1038	BEAVER CITY MUN POWER & LIGHT	1,374	0.0059	99.5862
480	1356	NAPOLEAN MUN UTILITIES	1,370	0.0059	99.5921
481	1732	WADENA LIGHT AND WATER DEPT (MO BASIN)	1,351	0.0058	99.5980
482	1442	READING MUN LIGHT	1,325	0.0057	99.6037
483	1193	FORD MOTOR CO	1,312	0.0056	99.6093
484	1128	COAHOMA ELECTRIC POWER (COHOMA)	1,307	0.0056	99.6149
485	1353	NYMAN ELECTRIC COOP (IAEC) (MYMAN)	1,305	0.0056	99.6205
486	1586	WOOD RIVER (CITY OF)	1,304	0.0056	99.6262
487	1298	LITTLETON MUN LIGHT DEPT	1,300	0.0056	99.6317
488	1541	TRUMAN MUN LIGHT PLANT	1,269	0.0055	99.6372
489	1153	DEL-MET CORP.	1,265	0.0054	99.6427
490	1252	INDUSTRIAL ELECTRIC (MINN)	1,256	0.0054	99.6481
491	1519	SULLIVAN ELECTRIC DEPT	1,250	0.0054	99.6534
492	1410	PANHANDLE EASTERN PIPE LINE CO	1,206	0.0052	99.6586

Rose Chemicals Site

Waste-In Company Ranking Report

Rank	PRP ID	PRP Name	Total Weight	Pct Of Total	Accum Pctg
493	1657	CONCORD ELEC CO(TSI)	1,200	0.0052	99.6638
494	1665	ENDICOTT JOHNSON CO(TSI)	1,200	0.0052	99.6690
495	1166	EAST CENTRAL ELECTRIC	1,190	0.0051	99.6741
496	1072	C & W ELECTRIC COOP	1,187	0.0051	99.6792
497	1606	J A C ELECT COOP	1,180	0.0051	99.6843
498	1717	BARNESVILLE MUN LT & POWER (MO BASIN)	1,169	0.0050	99.6893
499	1462	SAFE HARBOR WATER POWER CORP	1,150	0.0049	99.6942
500	1388	O & A ELECTRIC	1,135	0.0049	99.6991
501	1190	FLANDREAU	1,117	0.0048	99.7039
502	1505	SPENCER UTILITIES	1,096	0.0047	99.7086
503	1313	MARIGOLD FOODS (MINN)	1,093	0.0047	99.7133
504	1086	CAREY ELECTRIC (VILLAGE OF)	1,090	0.0047	99.7180
505	1741	CORN BELT POWER COOP (IAEC)	1,060	0.0046	99.7226
506	1231	HARRISONVILLE MO (CITY OF)	1,054	0.0045	99.7271
507	1058	BROKEN BOW MUN UTILITIES	1,039	0.0045	99.7316
508	1516	STERLING MUN LIGHT DEPT	1,035	0.0045	99.7361
509	1143	CREIG BOTETOURT ELECTRIC COOP	1,034	0.0044	99.7405
510	1703	READING MUNICIPAL LIGHT DEPT(TSI)	1,000	0.0043	99.7448
511	1011	ALTON MUN	985	0.0042	99.7491
512	1170	ECOLOGY & ENVIRONMENTAL SYSTEMS INC	975	0.0042	99.7532
513	1527	TALMAGE (VILLAGE OF)	975	0.0042	99.7574
514	1413	PARKER HANNIFIN CORP	960	0.0041	99.7616
515	1421	PIERCE UTILITIES	940	0.0040	99.7656
516	1033	BARTLETT ELECTRIC	936	0.0040	99.7696
517	1378	NORTH PLATTE MUN LIGHT & POWER	930	0.0040	99.7736
518	1233	HAWKEYE CHEMICAL	925	0.0040	99.7776
519	1568	WATSON ELECTRIC	925	0.0040	99.7816
520	1171	EDGAR (CITY OF)	920	0.0040	99.7856
521	1290	LEAVENWORTH-JEFFERSON ELECTRIC	913	0.0039	99.7895
522	1548	UNION RURAL ELECTRIC	906	0.0039	99.7934
523	1130	COLDWATER BOARD OF PUBLIC WORKS	904	0.0039	99.7973
524	1136	CONSOLIDATION COAL CO	884	0.0038	99.8011
525	1225	GULF OIL CHEMICAL CO (CHEVRON)	866	0.0037	99.8048
526	1742	HUMBOLDT COUNTY REC (IAEC)	848	0.0036	99.8085
527	1142	CP NATIONAL CORP	820	0.0035	99.8120
528	1662	EASTERN NY CORREC FACILITY(TSI)	800	0.0034	99.8154
529	1439	RALEIGH (CITY OF)	797	0.0034	99.8189
530	1429	PLAINVIEW ELECTRIC SYSTEM	778	0.0033	99.8222
531	1148	DARLINGTON P & L	775	0.0033	99.8256
532	1037	BEAR TOOTH ELECTRIC	763	0.0033	99.8288
533	1471	SCOTT NEW MADRID MISS ELECTRIC COOP	760	0.0033	99.8321

Rank	PRP ID	PRP Name	Total Weight	Pct Of Total	Accum Pctg
534	1483	SHOSHONE POWER & LIGHT	760	0.0033	99.8354
535	1059	BROOKINGS MUNICIPAL UTILITIES (BROOKING)	757	0.0033	99.8386
536	1154	DELANO GRANITE	755	0.0032	99.8419
537	1565	VIDELIA ELECTRIC DEPT	755	0.0032	99.8451
538	1653	ASHLAND ELEC DEPT(TOWN OF)(TSI)	750	0.0032	99.8484
539	1684	LONG ISLAND DEV CENTER(TSI)	750	0.0032	99.8516
540	1036	BEACH ELECTRIC (KANSAS)	745	0.0032	99.8548
541	1182	FEDERAL AVIATION ADM. (FAA)	740	0.0032	99.8580
542	1437	PRINCE GEORGE ELECTRIC COOP	724	0.0031	99.8611
543	1592	WYMORE LIGHT & POWER	724	0.0031	99.8642
544	1466	SAN PATRICIO ELECTRIC COOP	713	0.0031	99.8673
545	1198	FOUR COUNTY ELECTRIC	710	0.0031	99.8703
546	1217	GRAFTON LIGHT & WATER DEPT	703	0.0030	99.8734
547	1733	STAPLES (CITY OF) (MO BASIN)	703	0.0030	99.8764
548	1221	GREEN VALLEY CHEM.	700	0.0030	99.8794
549	1485	SIERRA ELECTRIC	700	0.0030	99.8824
550	1508	SAINT CLOUD HOSP (ST CLOUD)	680	0.0029	99.8853
551	1552	UNITED PROPERTIES	660	0.0028	99.8882
552	1000	A & N ELECTRIC COOP	653	0.0028	99.8910
553	1491	SMOOT GRAIN CO	651	0.0028	99.8938
554	1582	WHITE RIVER VALLEY ELECTRIC COOP	639	0.0027	99.8965
555	1024	ATCHISON ENGINEERING	620	0.0027	99.8992
556	1564	VICTORY ELECTRIC COOP	611	0.0026	99.9018
557	1509	ST JAMES MUN UTILITIES	608	0.0026	99.9044
558	1065	BUNGE CORP	580	0.0025	99.9069
559	1263	JANE CHINN MEMORIAL HOSPITAL (WESTWORLD)	578	0.0025	99.9094
560	1547	UNION COUNTY ELECTRIC	560	0.0024	99.9118
561	1549	UNISTRUT-GTE	550	0.0024	99.9142
562	1610	NORTH CENTRAL ELECTRIC COOP INC.	550	0.0024	99.9166
563	1528	TAUNTON MUN LIGHT PLANT	538	0.0023	99.9189
564	1281	KRAFCOR	534	0.0023	99.9212
565	1213	GLACIER ELECTRIC COOP	528	0.0023	99.9235
566	1206	GALT (CITY OF) (MISSOURI)	520	0.0022	99.9257
567	1372	NIXA (CITY OF) (MISSOURI)	520	0.0022	99.9279
568	1107	CHELSEA (VILLAGE OF)	500	0.0022	99.9301
569	1651	AMERICAN THREAD COMPANY(TSI)	500	0.0022	99.9322
570	1056	BRIGHAM CITY LIGHT & POWER	490	0.0021	99.9343
571	1329	MID AMERICA DAIRYMEN (MID AMER DAIRY)	490	0.0021	99.9365
572	1165	DOVE PIPE LINE CORP	480	0.0021	99.9385
573	1174	ELECTRO-CRAFT	452	0.0019	99.9405
574	1563	VIC MANUFACTURING	449	0.0019	99.9424

Clean Sites, Inc.
Rose Chemicals Site
Waste-In Company Ranking Report

Date: 04/06/88

Rank	PRP ID	PRP Name	Total Weight	Pct Of Total	Accum Pctg
575	1399	OMAHA STEEL CASTINGS	440	0.0019	99.9443
576	1017	AMOCO CORP. (AMOCO PIPE LINE)	435	0.0019	99.9462
577	1332	MILLE LACS ELECTRIC COOP	435	0.0019	99.9480
578	1348	MORGAN PACKING CO. (MORGAN MEAT)	420	0.0018	99.9498
579	1044	BLOOMING PRAIRIE PUBLIC UTILITIES	415	0.0018	99.9516
580	1434	PONTOTOC ELECTRIC POWER (PONTOTOC)	400	0.0017	99.9533
581	1474	SEDAN FLORAL	400	0.0017	99.9551
582	1012	AMERICAN CAN CO.	399	0.0017	99.9568
583	1545	TWIN VALLEY PUBLIC POWER	390	0.0017	99.9585
584	1360	RAVALLI COUNTY ELECTRIC	380	0.0016	99.9601
585	1308	MAGNOLIA ELECTRIC POWER (MS)	372	0.0016	99.9617
586	1566	VIGILANTE ELECTRIC COOP INC	365	0.0016	99.9633
587	1583	WHITEHALL LEATHER	365	0.0016	99.9648
588	1119	CLAY UNION ELECTRIC	361	0.0016	99.9664
589	1391	OCNTO FALLS (CITY OF)	360	0.0015	99.9679
590	1587	WOODBINE MUN	360	0.0015	99.9695
591	1248	HUDSON LIGHT & POWER DEPT	355	0.0015	99.9710
592	1158	DELTA MUNICIPAL	350	0.0015	99.9725
593	1134	CONCORD MUN LIGHT PLANT	327	0.0014	99.9739
594	1284	LAKEVIEW (CITY OF)	320	0.0014	99.9753
595	1009	ALGER DELTA COOP	309	0.0013	99.9766
596	1099	CENTRAL NEW MEXICO ELECTRIC	300	0.0013	99.9779
597	1694	MONADNOCK PAPER MILLS, INC(TSI)	300	0.0013	99.9792
598	1068	BURKE MUN	298	0.0013	99.9805
599	1057	BROADMOOR HOTEL INC	280	0.0012	99.9817
600	1090	CEDAR SPRING CASTING	264	0.0011	99.9828
601	1188	FIRESAFE PRODUCTS	250	0.0011	99.9839
602	1668	FISHERS ISLAND ELEC (TSI)	250	0.0011	99.9850
603	1718	CAMPBELL MUN ELECTRIC DEPT.	250	0.0011	99.9861
604	1571	WEBBER (CITY OF) KANSAS	249	0.0011	99.9871
605	1711	TRW BEARINGS DIVISION(TSI)	230	0.0010	99.9881
606	1251	INDEPENDENCE MUN LIGHT	213	0.0009	99.9890
607	1091	CENEX MINNEAPOLIS	210	0.0009	99.9900
608	1296	LINCOLN UNION ELECTRIC	210	0.0009	99.9909
609	1377	NORTH HENNEPIN VOTEC (NORTH HEMMPER)	200	0.0009	99.9917
610	1669	FRANCONIA PULP & PAPER (TSI)(C ISAACSON)	200	0.0009	99.9926
611	1696	NEW YORK STATE DEPT. OF HEALTH (TSI)	200	0.0009	99.9934
612	1338	MITCHELL LIGHT & POWER	185	0.0008	99.9942
613	1008	ALFALFA ELECTRIC	169	0.0007	99.9950
614	1594	YELLOW SPRING (VILLAGE OF)	155	0.0007	99.9956
615	1312	MAQUOKETA COUNTY REC (IAEC) (MAQUAKITA)	150	0.0006	99.9963

Rose Chemicals Site
Waste-In Company Ranking Report

Rank	PRP ID	PRP Name	Total Weight	Pct Of Total	Accum Pctg
616	1053	BRADSHAW (VILLAGE OF)	140	0.0006	99.9969
617	1512	ST MARYS (CITY OF) (KS)	133	0.0006	99.9974
618	1227	HAMPTON ELECTRIC (NEB)	125	0.0005	99.9980
619	1533	TOPEKA WATER POLLUTION	110	0.0005	99.9985
620	1177	ENTERPRISE MUN. LTG. SYSTEM (CITY OF)	90	0.0004	99.9988
621	1121	CLOUD COUNTY COOP	80	0.0003	99.9992
622	1591	WORTHINGTON REGIONAL HOSP (MINNESOTA)	53	0.0002	99.9994
623	1208	GARDNER (CITY OF) KANSAS	50	0.0002	99.9996
624	1351	PROSPECT MUN ELECTRIC (MUN BLDG ELEC CO)	35	0.0002	99.9998
625	1013	AMERICAN ELECTRIC CO	30	0.0001	99.9999
626	1652	ANITEC IMAGE CORP(TSI)	20	0.0001	100.0000

REPORT TOTALS:

23,238,784 100.0000 100.0000

----- End Of Report -----

SCHIFF HARDIN & WAITE

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October 24, 1989

FEDERAL EXPRESS

Stuart S. Lowry
Lowry & Johnson
323 Broadway
P. O. Box 10
Valley Falls, Kansas 66088

Re: *Rose Chemical*

Dear Mr. Lowry:

As you will undoubtedly know by the time you receive this letter, I had attempted to call you Monday but found that you were out. As I explained to you previously Kaw Valley's request to reconsider the waste-in amount attributed to them was presented to the Settlement Task Force at its meeting in Atlanta last week and the purpose of my call was to explain the results reached by the Task Force. In order to do that, however a brief background on how waste-in matters have been handled since early in the project may be helpful.

Well before even the Consent and Buyout offers were made in April, 1988 the Steering Committee's contractor, Clean Sites Inc., was reviewing and examining all of the available data (Rose Chemicals data as well as information received by USEPA pursuant to its Section 104(e) requests and provided to us) to develop an accurate waste-in list. Based on that review, which included interviews with former employees of Rose Chemicals to help determine what records appeared accurate and reliable, the group reached the conclusion that, as an initial cut, it would rely on the receiving logs at Rose Chemicals, a copy of which I have previously sent to you. The bases for this conclusion were that we had certain verifying information, such as from USEPA, that the logs were accurate and, second, the former employees of Rose indicated that, because Rose billed on a waste-in basis, those logs showing the amount received were accurately kept; other records at Rose, such as Certificates of Destruction or Certificates of Disposal could not be relied on. Based on that, the initial waste-in list was developed from that one set of logs. The Steering Committee did, however, notify all PRPs well before the offers were made of their waste-in amount and requested at that time that if any PRP had a disagreement with the amount it could submit its basis for that disagreement and it would be considered. At that time we had another task force set up simply to review such submissions from PRPs, of which there were numerous, and reach conclusions as to the accurate amount of waste-in for each PRP. Many of those objections were sustained, some were rejected, but in the process some operating principles were developed for review of waste-in disputes. The authorization of that task force was transferred to the task force that administered the Buyout and Consent Party offers in April, 1988 when those offers were made to the PRPs and that so called "Buyout Task Force" continued to analyze waste-in objections whenever they were received. Since the litigation was filed, the Task Force, with some slight change in its membership, has been reconstituted as the Settlement Task Force and has proceeded to exercise that function; I might note that Kaw Valley is the second defendant in the litigation to raise a waste-in objection and for the other defendant his objection was totally sustained and his waste-in amount was reduced to the level he demonstrated was correct.

For better than the past two years as the various bodies have analyzed these disputes certain particular items are focused on. One is the material log at Rose, a copy of which I also sent you. Another item that is often looked at is the manifest in the Rose files but, as you could see, Rose's copy of that was illegible as to the amounts on it. In addition the various task forces will examine any information submitted by the PRP. Thus at the meeting in Atlanta, the information you submitted along with the second tier log from Rose was considered in connection with your contention that the waste-in amount for Kaw Valley was inaccurate. Based on the review of both

SCHIFF HARDIN & WAITE

Mr. Stuart Lowry, Esq.
October 24, 1989
Page 2

Rose logs, the Task Force concluded that the amount originally attributed to Kaw Valley was probably in error and, based on those logs alone, it appears that there had been a double entry of the 18,636 pounds (converted from gallons) for the shipment. The general principal that the groups have always followed, however, in adopting any revised waste-in volume requires two pieces of evidence from the PRP that have some independent status; this could include such things as the completed manifest which you sent, a Rose Chemicals invoice reflecting the amount or, in some cases, a cancelled check to Rose which reflects not only the amount of payment but also the volume. Unfortunately the other two items which you submitted, being essentially internal documents, the Task Force did not believe it could, consistent with past practice, rely on them. Nonetheless, the Task Force would consider any additional evidence as to waste-in volume that Kaw Valley may wish to submit.

In the meantime, based on the issue that you raised and the review of the Rose records which is the first tier adjustment that has always been considered in the event an objection is raised (this review was not done as a regular course simply because there were over 700 PRPs to deal with and it was just too time consuming unless an objection was raised). The Settlement Task Force has approved a counter offer to you based on a waste-in amount of 18,636 pounds, a settlement price of \$3.50 per pound with credit to Kaw Valley for the amount previously paid. Thus the settlement amount would be \$65,226.00 less the \$3,943.00 previously paid for a settlement price of \$61,283.00. I believe I have previously explained the derivation of the \$3.50 per pound price so I will only briefly restate that. The Task Force concluded that, because it was necessary to sue these defendants to try to obtain their participation it wanted to make a single settlement offer to conclude their responsibility at the site, an offer comparable to the prior Buyout offer. On that premise the Buyout price, \$2.60 per pound, was escalated by the 12% late participation charge plus a slight increment to cover the time lapse (and therefore greater delay charge) that it may take to implement the settlement and, in addition, some amount for the cost and necessity of bringing the law suit. Essentially this would treat a settling defendant similarly to the Buyout parties who were timely in their response to the Steering Committee's request for participation at the site. I have previously sent you a copy of the form of settlement agreement that has been authorized for use in connection with the litigation. I must again stress, as I believe I have previously mentioned, that the Steering Committee has a strong sentiment in favor of comparable treatment for comparable parties and the settlement agreement and settlement price have already been accepted by several of the defendants and are in the process of being concluded so I do not believe, subject to additional evidence on the waste-in issue, that another counter offer would be productive. Also, of course, this offer assumes we have to expend no further effort in the litigation against the defendant.

Should you have any questions on this matter, please feel free to contact me.

Yours very truly,


Sheldon A. Zabel

SAZ/mac

cc: Gabriel M. Rodriguez, Esq.
Eric L. Lohrenz, Esq.

February 19, 1990
Draft

COMPARATIVE WASTE-IN LIST
Plaintiffs vs. Defendants

FOR SETTLEMENT PURPOSES ONLY
Martha C. Rose Chemical Company Site

Plaintiffs

4/6/88 PRP

Rank	Name	4/6/88 Total Weight
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1	NEW ENGLAND POWER SERV	2,616,754
2	IOWA PUBLIC SERV CO	1,370,628
3	COMMONWEALTH EDISON	1,358,468
4	KANSAS POWER & LIGHT	1,297,123
5	ILLINOIS POWER	1,073,559
6	SOUTHWEST ELEC POWER	751,883
8	OMAHA PUBLIC POWER	675,853
9	CENTRAL ILL PUB SERV	571,399
10	WEST TEXAS UTILITIES	549,047
11	OKLA GAS & ELECTRIC	540,092
12	LA POWER/NEW ORLEANS	538,326
13	CENTRAL LA ELEC(CLECO)	459,156
14	MISSOURI PUBLIC SERV	413,430
15	INTERSTATE POWER	410,018
16	COLO SPRINGS PUB UTIL	359,148
18	GENERAL MOTORS	280,632

TOTALS	13,265,516
Site Weight Totals	23,222,990
Percentage of Total	57%

Defendant Generators

24	INDUS OIL TANK & LINE	169,020
55	CANTON MUN UTILITIES	55,737
58	JERRY'S ELECTRIC	52,276
82	KAW VALLEY ELECTRIC	18,636
168	UNITED ELECTRIC COOP	13,736
215	BROOME CO DEPT PUB WORKS	9,300
273	CLARKSDALE MISSISSIPPI	5,988
384	VAN BUREN LIGHT & POWER	2,920
421	KOSCIUSKO WATER & LIGHT	2,115

TOTALS	329,728
Site Weight Totals	23,222,990
Percentage of Total	1%